

**REMARKS**

Reconsideration of the present application as amended is respectfully requested. Claims 1-11 were previously canceled. Claims 12-20 have been withdrawn from consideration. Claims 21-22 have been amended. Support for the amendments made to independent claims 21 and 22 can be found in at least Figures 2-7 of the application as originally filed. A telephone interview was conducted between Examiner Yan and Applicant's representatives on January 24, 2005 in which proposed claim amendments were discussed. During the interview the Examiner indicated that he would consider the claim amendments. Applicant wishes to thank the Examiner for the courtesies extending during the interview.

Claims 21 and 22 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. The Office Action indicates that "the newly added limitation in each of claims 21 and 22 that requires lacquer to be applied exclusively to the plate cylinder does not find proper support in the specification." It is asserted in the Office Action that "any ink or lacquer applied to the plate cylinder would inevitably be applied to the blanket cylinder as well through the continuous rotational contact." Applicant has amended claims 21 and 22 to remove the term "exclusively" and to further clarify the claimed invention. Applicant respectfully submits that claims 21 and 22 as amended meet the requirements of 35 U.S.C. 112, first paragraph and requests the 35 U.S.C. 112, first paragraph rejection of claims 21 and 22 be withdrawn.

Independent claims 21 stands rejected under 35 U.S.C. 103(a) as being unpatentable over GB 2119711 in view of EP 0574124. Claims 21 has been amended to include the feature of "applying lacquer to the plate cylinder by direct contact of a roller with said plate cylinder, said roller adapted to receive the lacquer from the doctor blade chamber device." Applicant respectfully submits that GB 2119711 fails to teach or suggest at least this feature of independent claim 21. GB 2119711 describes a printing machine with a combined moistening and lacquering device. Figures 1-2; page 1, lines 61-65; and page 1, lines 113-116 of GB 2119711 describe a pivotable lacquer application roller 7 which effects transfer of lacquering agent directly from a wiper roller 5' to a blanket cylinder 10 by placement of the lacquer application roller 7 on the blanket cylinder 10. Applicant respectfully submits that GB 2119711 fails to teach or suggest applying lacquer to a plate cylinder by direct contact of a roller with the

plate cylinder, and further where the roller adapted to receive the lacquer from a doctor blade chamber device as found in claim 21.

The Office Action acknowledges that GB 2119711 does not describe the use of a doctor blade chamber device. The Office Action asserts that EP 0574124 teaches "a coating apparatus for use in a rotary offset printing machine the conventional use of a fluid applying device having a doctor blade chamber device the exact same structure as recited." EP 0574124 describes in Figure 4, for example, a coating applicator roller 68 for applying a liquid coating material to a delivery cylinder 42 where the liquid coating material is supplied from a doctor blade head 98. Applicant respectfully submits that EP 0574124 also fails to teach or suggest at least the aforementioned feature of independent claim 21 of "applying lacquer to the plate cylinder by direct contact of a roller with said plate cylinder, said roller adapted to receive the lacquer from the doctor blade chamber device." Applicant respectfully submits that independent claim 21 distinguishes over GB 2119711 in view of EP 0574124 and requests that the 35 U.S.C. 103(a) rejection of independent claim 21 be withdrawn.


Independent claim 22 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 4,722,273 to Jahn ("Jahn") in view of EP 0574124. Independent claim 22 has been amended to include the feature of "applying lacquer to the plate cylinder by direct contact of a roller with said plate cylinder, said roller adapted to receive the lacquer from the doctor blade chamber device." Applicant respectfully submits that Jahn fails to teach or suggest at least this feature of independent claim 22. Jahn describes a washing device for washing a rubber blanket cylinder in a rotary offset printing machine, the washing device being convertible to a device for applying lacquer to the rubber blanket. Figure 1 of Jahn describes a washing device 11 including a washing roller 12 and a metering roller 13 for applying water to a blanket cylinder 8. Jahn further describes that the washing roller 12 is provided with a collecting vessel 14 for dirty cleaning liquid, and the metering roller 13 can be provided with a doctor blade 15. Jahn further describes that during a lacquering mode, the metering roller 13 is moved into engagement with the blanket cylinder 8. Applicant respectfully submits that Jahn fails to teach or suggest applying lacquer to a plate cylinder by direct contact of a roller with the plate cylinder, where the roller is adapted to receive the lacquer from a doctor blade chamber device as found in claim 22.

The Office Action acknowledges that "neither the lacquer applying unit 11 nor the dampening unit 7 of Jahn uses a doctor blade chamber device to control the amount of fluid being applied as recited." The Office Action asserts that EP 0574124 teaches "a coating apparatus for use in a rotary offset printing machine the conventional use of a fluid applying device having a doctor blade chamber device the exact same structure as recited." For similar reasons as those discussed with respect to independent claim 21, Applicant respectfully submits that EP 0574124 also fails to teach or suggest at least the aforementioned feature of independent claim 22 of "applying lacquer to the plate cylinder by direct contact of a roller with said plate cylinder, said roller adapted to receive the lacquer from the doctor blade chamber device." Applicant respectfully submits that independent claim 22 distinguishes over Jahn in view of EP 0574124 and requests that the 35 U.S.C. 103(a) rejection of independent claim 22 be withdrawn.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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